

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands)	WT Docket No. 03-66 RM-10586
)	
Part 1 of the Commission's Rules - Further Competitive Bidding Procedures)	WT Docket No. 03-67
)	
Amendment of Parts 21 and 74 of the Commission's Rules With Regard to Licensing in the Multipoint Distribution Service and in the Instructional Television Fixed Service for the Gulf States)	WT Docket No. 02-68 RM-9718
)	

To: The Secretary, FCC
Attention: Chief, Wireless Telecommunications Bureau

MOTION FOR EXTENSION OF TIME

The National EBS Association ("NEBSA")¹ and the Catholic Television Network ("CTN"), pursuant to Sections 1.46 and 1.415 of the FCC's rules, hereby request that the Commission extend by 75 days the time afforded for the filing of comments and reply comments in response to the *Second Further Notice of Proposed Rulemaking* in this proceeding.

Comments currently are due on July 7, 2008, and reply comments are due August 6, 2008. These dates fall in the middle of the summer recess period for virtually all schools, colleges and universities, making it difficult

for NEBSA, CTN, EBS licensees and other educators to coordinate their response to the important issues raised in this proceeding.

Issues relating to licensing of EBS “white space” raise complex questions of public policy, including the ability of educators to participate in auctions, alternatives for licensing other than routine application and auctions, applicant qualifications, application processes, and auction processes. NEBSA and CTN have diligently been engaged in review and analysis of the legal and practical issues associated with EBS white space licensing, and discussions are ongoing among the organizations, their constituents and the Wireless Communications Association International (“WCA”). The goal of NEBSA and CTN is to develop a consensus approach to white space licensing that would be supported by their constituents, educators in general, and wireless broadband commercial operators. It has become clear, however, that finding common ground is exceptionally challenging, a task made even more difficult for educators during the summer months.

CTN and NEBSA respectfully request that the current deadlines for filing in response to the *Second Further Notice of Proposed Rulemaking* be extended by 75 days, which would require that comments be filed by September 22, 2008, and reply comments by October 22, 2008. Grant of this extension will considerably improve CTN’s and NEBSA’s ability to reach a

¹ The National EBS Association was formerly known as the National ITFS Association (“NIA”).

consensus on these issues, which, in turn, may help facilitate the Commission's decision-making tasks.

NEBSA and CTN believe that grant of the extension will promote the Commission's goal of encouraging deployment of wireless broadband networks over EBS and BRS spectrum, by facilitating a consensus among interested parties on the relevant issues. Moreover, during the coming weeks, Commission staff directly involved in this proceeding are expected to be enmeshed in addressing the combination of Sprint Nextel's WIMAX operations and Clearwire.

CTN and NEBSA have been advised that the WCA supports this extension request.

Respectfully submitted,

NATIONAL EBS ASSOCIATION
NETWORK

CATHOLIC TELEVISION

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June 13, 2008

